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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JONATHAN GROVEMAN,
Plaintiff,

v.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA, MICHAEL V. DRAKE,
GARY S. MAY, MARY CROUGHAN,
RENETTA GARRISON TULL, CLARE
SHINNERL, PABLO REGUERIN, AND
DOES 1-10,

Defendants.

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Case No. 2:24-cv-01421-DJC-AC

**DEFENDANTS' NOTICE OF MOTION
AND MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

Accompanying Documents:
Memorandum of Points and Authorities;
Declaration of Matthew R. Cowan;
Request for Judicial Notice

Date: 1/9/2025
Time: 1:30 PM
Courtroom: 10, 13th Floor
Judge: Hon. Daniel J. Calabretta

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on January 9, 2025 at 1:30 PM, or as soon thereafter as the matter may be heard, in the courtroom of the Honorable Daniel J. Calabretta (Courtroom 10) of the above-entitled Court, located at 501 I Street, Sacramento, California 95814, The Regents of the University of California, Michael V. Drake, Gary S. May, Mary Croughan, Renetta Garrison Tull, Clare Shinnerl, and Pablo Reguerin ("Defendants") will, and hereby do, move the Court, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), for an order dismissing the claims which Plaintiff Jonathan Groveman has asserted against them. Defendants' motion is based on this Notice of Motion and Motion to Dismiss together with the accompanying Memorandum of Points and Authorities; the Declaration of Matthew R. Cowan and exhibits attached thereto; the Request for Judicial Notice; the arguments of counsel, all pleadings and papers on file in this matter, and such other further written and oral argument as may be presented to the Court at a hearing on this Motion or before the Court's decision.

Pursuant to this Court's standing order, Defendants submit the following certification regarding meet and confer efforts. On October 14, 2024, undersigned counsel met and conferred with Plaintiff's counsel David M. Rosenberg-Wohl through a video conference to discuss the arguments underlying the present Motion. Counsel discussed each argument contained in this motion, agreeing after discussion that they were legal disputes about which the parties simply disagreed. Consequently, the parties have not been able to reach an agreement that would obviate the need for Defendants to file its Motion to Dismiss the First Amended Complaint.

Dated October 17, 2024.

By: /s/ Matthew R. Cowan

Matthew R. Cowan

Attorney for Defendants